

Brandon B. Mayfield
E-mail: mayfieldbrandon@hotmail.com
Law Office of Brandon Mayfield, LLC
3950 SW 185th Avenue
Beaverton, OR 97007
Telephone: 503.941.5101
Fax: 503.941.5102
Attorney for Plaintiff Ram Nayaran

Christopher W. Angius
E-mail: christopher.angius@hklaw.com
HOLLAND & KNIGHT LLP
111 S.W. Fifth Avenue, 2300 U.S. Bancorp Tower
Portland, Oregon 97204
Telephone: 503.243.2300
Fax: 503.241.8014
Attorneys for Defendant JetBlue Airways Corporation

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORLAND DIVISION

RAM NAYARAN,
Plaintiff,
v.
JETBLUE AIRWAYS CORPORATION,
Defendant.

Case No. 3:12-CV-00811-BR

**RULE 26(f) JOINT STATUS REPORT
AND PROPOSED CASE
MANAGEMENT SCHEDULE**

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and this Court's Order dated July 20, 2012, Plaintiff and Defendant submit the following Joint Status Report and Proposed Case Management Schedule.

1. Nature of the Case: This case involves claims by Plaintiff for discrimination and breach of contract arising from an incident in which Plaintiff was refused transportation by Defendant on July 15, 2011.

2. Alternative Dispute Resolution: Both parties are in agreement that this case would benefit from ADR, but have not been able to reach agreement on the timing of ADR. Defendant believes that the case would benefit from prompt court-sponsored ADR pursuant to LR 16-4(e)(2). Plaintiff also believes that the case would benefit from ADR, but has not made a decision on when ADR should take place. The parties intend to work together to agree upon the earliest date for ADR consistent with the parties' availability.

3. Amend Pleadings and Joinder of Claims, Parties and Remedies: The parties propose that the deadline be August 27, 2012.

4. Proposed Discovery Plan:

A. Dates of Rule 26(f) Conference and Initial Disclosures: The Rule 26(f) conference of counsel took place between July 26-August 2, 2012. Plaintiff was represented by Brandon Mayfield of the Law Office of Brandon Mayfield, LLC. Defendant was represented by Christopher Angius of Holland & Knight LLP. The parties did not agree to waive initial disclosures, as permitted by Rule 26(a)(1) and LR 26-2, and propose that the parties make initial disclosures within 30 days after the filing of this Joint Status Report.

B. Subjects of Discovery: At this stage of the case, the parties have identified the subjects of discovery as the facts relating to the incident on July 15, 2011 which gave rise to the claims in this case, expert opinion relating the incident, and the damages claimed by Plaintiff.

C. Fact Discovery: The parties agree that fact discovery shall be completed by December 30, 2012.

D. Discovery Motions: The parties agree that any fact discovery motions shall be filed by January 30, 2013.

E. Expert Reports: Opening expert reports shall be served by January 30, 2013. Rebuttal expert reports shall be served by March 1, 2013.

F. Expert Discovery: The parties agree that expert discovery shall be completed by April 1, 2013.

5. Use of Magistrate Judge: The parties do not consent to use of a Magistrate Judge to conduct all proceedings in this matter.

6. Dispositive Motions: The parties agree that any dispositive motions shall be filed by May 1, 2013.

7. Pretrial Statements and Order: The joint pretrial order is due on June 30, 2013.

8. Trial Readiness Date: The parties agree that this case will be ready for trial between August 1 and August 15, 2013.

9. Nature of Trial: Plaintiff has requested a jury trial.

10. Length of Trial: The parties anticipate that trial will take no more than 5 days.

11. Scheduling Conference: The Rule 16 conference is set for August 3, 2012 at 10:00 a.m. before this Court. The parties were notified of this conference by ECF on July 27, 2012.

Dated: August 2, 2012

LAW OFFICE OF BRANDON MAYFIELD

By /s/ Brandon Mayfield

Brandon Mayfield (OSB No. 000824)
mayfieldbrandon@hotmail.com
3950 SW 185th Avenue
Beaverton, OR 97007
Telephone: 503-941-5101
Fax: 503-941-5102

HOLLAND & KNIGHT LLP

By /s/ Christopher W. Angius

Christopher W. Angius (OSB No. 841576)
christopher.angius@hklaw.com
2300 U.S. Bancorp Tower
111 SW Fifth Avenue
Portland, OR 97204
Telephone: 503-243-2300

Attorney for Plaintiff Ram Nayaran

Fax: 503-241-8014

Christopher G. Kelly (*pro hac vice*)
christopher.kelly@hklaw.com
Sarah G. Passeri (*pro hac vice*)
sarah.passeri@hklaw.com
31 West 52nd Street
New York, NY 10019
Telephone: 212-513-3200
Fax: 212-385-9010

Attorneys for Defendant JetBlue Airways
Corporation

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing RULE 26(f) JOINT STATUS REPORT AND PROPOSED CASE MANAGEMENT SCHEDULE to be served on the following person[s]:

Brandon Mayfield
mayfieldbrandon@hotmail.com
Law Office of Brandon Mayfield
3950 SW 185th Avenue
Beaverton, OR 97007

by the following indicated method or methods:

- by CM/ECF electronically mailed notice from the Court on the date set forth below.
- by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.
- by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or their attorneys, on the date set forth below.
- by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax numbers for the parties' and/or attorneys' offices, on the date set forth below.

DATED: August 2, 2012

/s/ Christopher W. Angius